

EXHIBIT 1

May 13, 2016

Via Electronic Mail

Michael Dell'Angelo
Berger & Montague
1622 Locust Street
Philadelphia, PA 19103
mdellangelo@bm.net

Re: Le, et al. v. Zuffa, LLC; Case No. 2:15-cv-01045-RFB-(PAL),
and consolidated cases

Dear Michael:

In keeping with our commitment to the Court in the recent Joint Status Report to provide additional information about the documents recently discovered in the Early Case Assessment archive ("ECA") maintained by Zuffa's former e-discovery vendor from the Federal Trade Commission 2011 investigation into the Strikeforce acquisition, we are filing an update with further information regarding the sources and volumes of documents from those sources. We write here to provide additional information regarding those documents as well as to lay out our proposal for their review.

The ECA contains a total of approximately 1.8 million documents, including approximately 97,000 documents that were ultimately produced to the FTC and which have been re-produced to Plaintiffs in this case. Accounting for those documents in the ECA that have already been re-produced to Plaintiffs, there are approximately 1.7 million documents remaining in the archive that are either undated or fall within the relevant time period. Charts 1-3 at the end of this document show the breakdown of documents by custodian and/or employee within the relevant time period, as well as undated documents.

For the 22 ordered custodians in this case, the ECA contains a total of 807,836 documents in the relevant time period, including documents with no date value.¹ The operative

¹ There are no documents in the ECA for eight of the ordered custodians – Nakisa Bidarian, Tracy Bleczinski, Donna Marcolini, Sonja McKinney, Michael Pine, Jackie Poriadjian, Marc Ratner, and Marshall Zelaznik.

Michael Dell'Angelo

May 13, 2016

Page 2

search terms (the Ordered Terms, Zuffa's Revised Search Terms, the Original FTC search terms, and the Revised FTC Search Terms with new fighter names) hit on a total of 419,035 documents from the ordered custodians. Chart 1 below shows the breakdown of documents for the list of ordered Zuffa custodians, the years for which documents are available for each custodian, and the number of documents that our search terms hit on. In addition to the Zuffa custodians, the ECA also contains documents from 12 Strikeforce employees, totaling 561,892 documents in the relevant time period, including documents with no date value. Chart 2 shows the breakdown of documents for the Strikeforce employees. For the remaining Zuffa employees or former employees in the ECA who are not ordered custodians in this case, there are 342,199 documents in the relevant time period, including documents with no date value. Chart 3 shows the breakdown of documents in the ECA for the remaining Zuffa employees.²

We propose to review for potential production in this case the documents that the operative search terms hit on from six custodians from the ECA—Lorenzo Fertitta, Dana White, Kirk Hendrick, Brian Johnston, Joe Silva, and Sean Shelby. Application of the operative search terms to these custodians would require Zuffa to review an additional 138,246 documents from this time period.

We know that you are out of the country this week, but please let us know if you have availability to meet and confer on Monday, May 16.

Sincerely,

/s/ John F. Cove, Jr.

John F. Cove, Jr.

cc (via e-mail only):

Joseph Saveri (jsaveri@saverilawfirm.com)

Patrick Madden (pmadden@bm.net)

Colby Williams (jcw@campbellandwilliams.com)

² The winnowing proposals have not been applied to the documents from this ECA.

Michael Dell'Angelo

May 13, 2016

Page 3

Chart 1: Ordered Custodians

| Custodian | Total Documents (Including Undated Docs) | Date Range | Total Search Term Hits |
|-----------------------------|---|-------------------|-----------------------------------|
| Michael Mersch | 171,456 | 2006-2012 | 107,268 |
| Kirk Hendrick | 114,118 | 2005-2011 | 55,650 |
| Tracy Long (Tracy Hyman) | 103,135 | 2005-11 | 71,924 |
| Lorenzo Fertitta | 78,657 | 2005-2012 | 35,604 |
| Craig Borsari | 71,265 | 2005-2011 | 20,059 |
| John Mulkey | 56,494 | 2005-2012 | 18,543 |
| Peter Dropick | 50,143 | 2005-2012 | 29,749 |
| Bryan Johnston | 45,432 | 2005-2011 | 17,161 |
| Joe Silva | 32,946 | 2005, 2007-2011 | 20,710 |
| Lawrence Epstein | 30,073 | 2007-2012 | 13,659 |
| Michael Mossholder | 24,755 | 2007-2011 | 13,315 |
| Dana White | 12,118 | 2005-2011 | 3,399 |
| Reed Harris | 9,150 | 2005-2011 | 6,272 |
| Sean Shelby | 8,094 | 2005-2011 | 5,722 |
| TOTALS | 807,836 | | 419,035 |

Michael Dell'Angelo

May 13, 2016

Page 4

Chart 2: Strikeforce Employees

| No. | Employee | Total Docs (including undated docs) | Date Range |
|------------|------------------------|--|-------------------|
| 1 | Andrew Ebel | 252,082 | 2005-2011 |
| 2 | Mike Aframowitz | 117,971 | 2005-2011 |
| 3 | Richard Chou | 46,350 | 2009-2011 |
| 4 | Jennifer Cooke | 77,385 | 2005-2011 |
| 5 | Shannon Knapp | 26,859 | 2009-2011 |
| 6 | Scott Coker | 20,860 | 2006-2011 |
| 7 | Carie A'Ana | 16,150 | 2009-2011 |
| 8 | Strikeforce | 2,582 | 2005-2011 |
| 9 | Bob Cook | 1,213 | 2009-2011 |
| 10 | Kenn Ellner | 353 | 2011 |
| 11 | Strikeforce Management | 56 | 2008-2011 |
| 12 | Strikeforce Shared | 31 | [Undated only] |
| | TOTAL | 561,892 | |

Chart 3: Other Zuffa Employees

| No. | Employee | Total Docs (including undated docs) | Date Range |
|------------|---------------------|--|-------------------|
| 1 | Edward Muncey | 91,277 | 2005-2011 |
| 2 | Doug Hartling | 81,153 | 2005-2011 |
| 3 | Chad Hurley | 72,631 | 2005-2011 |
| 4 | Tim Bellamy | 31,417 | 2008-2011 |
| 5 | Beth Turnbull | 27,103 | 2005-2011 |
| 6 | Don Gold | 20,644 | 2007-2011 |
| 7 | Elizabeth Locheur | 17,351 | 2006, 2008-2011 |
| 8 | Graphics Collateral | 253 | 2011 |
| 9 | Reid Sterett | 210 | 2009-2011 |
| 10 | Tara Connell | 142 | 2010-2011 |
| 11 | Brandon Clark | 18 | 2009-2011 |
| | TOTAL | 342,199 | |